

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Newport News Division*

UNITED STATES OF AMERICA

v.

Criminal No.: 4:23-cr-054

TERRANCE LEONARD VICK,

Defendant.

**DEFENDANT’S MOTION AND BRIEF IN SUPPORT TO MODIFY  
ORDER SETTING CONDITIONS OF RELEASE FOR  
REMOVAL OF HOME DETENTION AND LOCATION MONITORING**

NOW COMES the Defendant, Terrance Leonard Vick (the “Defendant”), by counsel, and respectfully moves this Court for entry of an order modifying His conditions of release to remove his electronic monitoring and home confinement conditions. In support of His motion, the defendant states the following:

1. On October 12, 2023, this Court set Initial Conditions of Release as to Mr. Vick (Doc. 287).
2. This Court has modified Mr. Vick’s conditions of release regarding his residential address and third party custodian.
3. He now resides with Shameka Harris, the mother of his son.
4. Mr. Vick has voluntarily and timely returned to Virginia for all court appearances and has fully complied with his conditions of bail.
5. Mr. Vick is employed with a metal roofing, wall, deck, and edge systems company in Georgia. His son has just entered the 12<sup>th</sup> grade in High School and Mr. Vick would

- primarily like to support his son at school events, and have some more time with his son outside their home prior to sentencing.
6. Counsel has corresponded with Ms. M. Childress, U.S. Probation Officer for the Eastern District of Virginia, who does not hold a position with respect to this request, deferring instead to Mr. Vick's Georgia probation officer (Email, September 3, 2024)
  7. Counsel has corresponded with Probation Officer, Ben Heath, Location Monitoring Specialist, US District Court, Northern District of Georgia, who has no objection to the removal of Mr. Vick's location monitoring conditions, including the home detention, scheduling and equipment requirements, and further advises that Mr. Vick is currently working and living in a stable address.
  8. Counsel has conferred with Assistant United States Attorney Eric Hurt, who does not object to this request.
  9. Counsel requests that his Bail Condition 8(p)(ii) and 8(q)(i) be stricken or removed from his conditions.

### **Law and Argument**

Pursuant to 18 U.S.C. § 3145(a)(2) a defendant may file a motion for amendment of the conditions of release, which shall be determined promptly. This Court has original jurisdiction over the offense and is proper to hear this motion.

For the reasons stated above, the Defendant makes this request.

**Requested Relief**

WHEREFORE, the Defendant, by counsel, moves this Court for entry of an Order modifying the conditions of release for removal of Mr. Vick's location monitoring and home detention requirements of bail.

I ask for this:

/s/  
\_\_\_\_\_  
Brian M. Latuga, Esquire  
VSB #86300  
WOLCOTT RIVERS GATES  
200 Bendix Road, Suite 300  
Virginia Beach, VA 23452  
Telephone: 757.497.6633  
Facsimile: 757.497.7267  
E-mail: [blatuga@wolriv.com](mailto:blatuga@wolriv.com)  
*Counsel for Defendant Terrance Vick*

**CERTIFICATE OF SERVICE**

I hereby certify on the 6th day of September, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record.

With courtesy copy e-mailed to:

USPO Margaret Childress

*By E-mail*

USPO Ben Heath, Location Monitoring Specialist, USDC, Georgia

[Benjamin\\_h\\_Heath@ganp.uscourts.gov](mailto:Benjamin_h_Heath@ganp.uscourts.gov)

\_\_\_\_\_/s/\_\_\_\_\_  
Brian M. Latuga, Esquire  
VSB #86300  
WOLCOTT RIVERS GATES  
200 Bendix Road, Suite 300  
Virginia Beach, VA 23452  
Telephone: 757.497.6633  
Facsimile: 757.687.3655  
E-mail: [blatuga@wolriv.com](mailto:blatuga@wolriv.com)  
*Counsel for Defendant Terrance Vick*